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January 10, 2020

Via ECF

Honorable Colleen McMahon, U.S.D.J.

United States District Court, Southern District of New York

500 Pearl Street, Room 1640

New York, NY 10007

Ok.

Colleen McMahon

Re: **Orlando Ramirez and Nancy Ramirez v. Con-way Freight, Inc.,**
S.D.N.Y. 16-cv-03997 (CM)

1/10/2020

Dear Judge McMahon:

We represent defendant in the above-referenced action. We are submitting, with the permission and consent of plaintiffs' counsel, to allow the parties to submit the Joint Pre-Trial Order on Monday, January 13, 2020. The reason for the request is that I was advised by plaintiffs' counsel that he has been delayed in providing his final portion of the Joint Pre-Trial Order and will not have it completed today because of a brief he had due this week in the matter of *NYCL Acquisition LLC, d/b/a New York Water Taxi and/or Circle Line Downtown, LLC et. al.*, United States District Court, Southern District of New York, Civil Action No. 18-cv-546 (VM). We did meet to discuss the Pre-Trial Order and related submissions and have exchanged drafts. Once we obtain the plaintiffs' final portion of the Pre-Trial Order and related submissions (Jury Charges, Voir Dire, and Verdict Sheet) we need to review it for possible objections, responses.

Based on the above circumstances we respectfully request the short extension to file the Joint Pre-Trial Order and related submissions on Monday.

Respectfully,

S/ Peter C. Bobchin

Peter C. Bobchin

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PCB: ms

cc: Douglas Milch (via ECF)